Ross D. Tillman, Esq. BOONE KARLBERG P.C. 201 West Main, Suite 300 P.O. Box 9199 Missoula, MT 59807-9199 Telephone: (406) 543-6646 Facsimile: (406) 549-6804 rtillman@boonekarlberg.com

-with-

Bryan R. Freeman, Esq. (pro hac vice) John J. Laravuso, Esq. (pro hac vice) LINDQUIST & VENNUM, LLP 4200 IDS Center 80 South 8<sup>th</sup> Street Minneapolis, MN 55402

Attorneys for Galilea, LLC

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA BILLINGS DIVISION

GALILEA, LLC,

Plaintiff,

v.

AGCS MARINE INSURANCE COMPANY, LIBERTY MUTUAL INSURANCE COMPANY, and TORUS NATIONAL INSURANCE COMPANY,

Defendants.

Cause No. 15-cv-00084-SPW

DECLARATION OF TAUNIA KITTLER

Taunia Kittler states as follows:

- My husband Chris Kittler and I are the only members of Plaintiff
   Galilea, LLC. I make this declaration based on personal knowledge.
- 2. I have reviewed Chris's Declaration that is being filed at the same time as this Declaration. It accurately states the reason that "underwriter" was identified as his occupation on the subject insurance application, and that he is not an "insurance underwriter."
  - 3. I am also not an insurance underwriter.
- 4. As also set forth in Chris's Declaration, Galilea, LLC, is a limited liability company formed for the purpose of owning the subject catamaran.

  Galilea, LLC does not have and has not ever had any employees. Its primary assets are the catamaran (now a total loss due to the grounding that led the insurance claim that is the subject of this lawsuit) and the subject insurance policy. Galilea, LLC does not generate, and has not ever generated, any revenue. The insured catamaran was being used solely for pleasure throughout the entire period from our request for an insurance quote for the subject policy until the vessel's grounding.
- 5. I am not an attorney. I did not consult or obtain advice from an attorney in conjunction with Galilea, LLC's application for and purchase of the subject insurance policy. I also did not engage the services of an insurance broker

in conjunction with Galilea, LLC's application for and purchase of the subject insurance policy.

I declare under the penalty of perjury that this declaration is true and correct. Executed on October 30, 2015, at Melville, Montana.

Taunia Kittler
Taunia Kittler